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7 UNITED STATES BANKRUPTCY COURT

8 NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION

9 In Re:

10 LEGAL RECOVERY, LLC

11 Debtor,

Case No.: 24-30074
Chapter 7

CREDITOR CHARLES LI'S
OPPOSITION TO DISMISSAL OR
CLOSING OF CASE; DECLARATION
OF DUY THAI

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16 **CREDITOR CHARLES LI'S OPPOSITION TO DISMISSAL OR CLOSING OF CASE**

17 The Court should not dismiss or close Legal Recovery, LLC's ("Debtor")
18 bankruptcy case, which has been converted to Chapter 7. Creditor Charles Li maintains
19 that the Debtor has other assets that it is hiding in other accounts and under other people's
20 names.

21 Creditor Li obtained an Order from this Court for Debtor to appear for a
22 Rule 2004 examination, which is scheduled for this Friday, September 27, 2024. Debtor
23 was supposed to produce documents last week on September 20, but failed to do so.
24 When Li's undersigned counsel asked Debtor's manager, Demas Yan, about it, he
25 expressed that he did not have to comply because he expected the case to be dismissed or
26 closed.

The Court should keep the case open long enough for Creditor Li to complete the examination (and the probably the motion that would follow). Debtor's noncompliance with the production of documents means that the examination cannot be completed this Friday. Li has litigated against Demas Yan and his various shell entities for almost 15 years and expects to find other assets, or evidence that the trustee and creditors could use to locate additional assets. Yan and Debtor have thumbed his nose at the procedures and requirements of this Court and are now thumbing his nose at the Order for 2004 examination. The Court should not permit them to do that.

DATED: September 24, 2024

/s/Duy Thai

Duy Thai

Attorney for Charles Li

DECLARATION OF DUY THAI

I, Duy Thai, declare as follows:

1. I am the attorney for Creditor Charles Li in this above-entitled matter. I make this declaration upon personal knowledge or, where so indicated, upon information and belief.

2. On September 23, 2024, I emailed Demas Yan to ask why he had not produced documents on September 20, 2024, as required by the Court's Order for 2004 Examination. Yan responded: "Case closed also no attorney." I asked him to confirm whether he will appear for his examination, ordered to be on Friday, September 27, 2024. I have not received a response.

3. Because Debtor failed to produce documents last week, I will not be able to complete the examination on Friday. If Debtor and its manager do not cooperate in rescheduling it, creditor Li may need to file a motion for Court relief.

1 I declare under penalty of perjury under the laws of the State of California
2 that the foregoing is true and correct and that this declaration was executed in San
3 Francisco, California on September 24, 2024.

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/s/Duy Thai

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Duy Thai

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